

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

-v.-

JOSHUA MAST, *et al.*,

Defendants,

and

UNITED SECRETARY OF STATE
ANTONY BLINKEN, *et al.*

Nominal Defendants.

CIVIL NO: 3:22-cv-00049-NKM-JCH

**DEFENDANT RICHARD MAST'S MOTION TO SEAL EXHIBIT 2 TO THE
SUPPLEMENTAL AUTHORITY IN SUPPORT OF HIS RENEWED MOTION TO
COMPEL AND MEMORANDUM OF LAW IN SUPPORT OF MOTION TO SEAL**

Defendant Richard Mast hereby moves for an order to seal Exhibit 2 to his supplemental authority in support of his currently pending renewed motion to compel (Dkt. No. 289 & 291) pursuant to Local Civil Rule 9 and this Court's Protective Order (ECF No. 26). The document is a state court order that is subject to sealing per the state court.

In support of this motion to seal, Defendant Richard Mast states as follows: This Court has issued a Protective Order (ECF No. 26) allowing Plaintiffs to proceed under pseudonyms and requiring the parties to use pseudonyms. The state court has placed all court filings under a seal, thereby requiring filing the Exhibit 2 under seal in this matter. Accordingly, Defendant Mast requests that the Court order the sealing of Exhibits 2 to the supplemental authority just filed..

A proposed Order is attached as Exhibit A to this Motion.

Dated: December 4, 2023

Respectfully submitted,

/s/David Yerushalmi

David Yerushalmi, Esq.*

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(*Admitted *pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically: none.

/s/David Yerushalmi
David Yerushalmi, Esq.